

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

BRIAN BEMKE (on behalf of himself and others similarly situated),
SCOTT COLLETT (on behalf of himself and others similarly situated),
JOHN FERIOZZI (on behalf of himself and others similarly situated),
JUDY FINTZ (on behalf of herself and others similarly situated),
SARAH JAMIESON (on behalf of herself and others similarly situated),
EVAN JOHNSON (on behalf of himself and others similarly situated),
TRACY LONG (on behalf of herself and others similarly situated), and
CLIFFORD NEUMANN (on behalf of himself and others similarly situated),

Plaintiffs,

v.

Case No.: 21-cv-560

AMY PECHACEK, in her official capacity as Secretary-designee of the State of Wisconsin
Department of Workforce Development,

Defendant.

MOTION FOR PRELIMINARY INJUNCTION

NOW COME THE PLAINTIFFS, by their attorneys, Gingras, Thomsen & Wachs, LLP, Axley Brynerson, LLP, and Victor Forberger, Esq., and move this Court for a preliminary injunction to enjoin the enforcement of Wisconsin Statute § 108.04(12)(f) during the pendency of this action pursuant to Rule 65 of the Federal Rules of Civil Procedure. This Motion will be heard at a time and place as determined by this Court. The basis for this Motion and arguments in support thereof are included in the Brief in Support and Affidavit of Victor Forberger and attachments thereto which are filed contemporaneously herewith. Notice and service of this Motion upon the adverse party has been accomplished on September 7, 2021.

(Signatures on following page)

Dated this 7th day of September, 2021.

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